

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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IN RE THE BEAR STEARNS COMPANIES,  
INC. SECURITIES, DERIVATIVE, AND ERISA  
LITIGATION

This Document Relates To:

Securities Action, 08-Civ-2793 (RWS)

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Master File No.:

08 M.D.L. No. 1963 (RWS)

**NOTICE OF LEAD PLAINTIFF’S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF PARTIAL SETTLEMENT,  
APPROVAL OF NOTICE TO THE SETTLEMENT CLASS AND  
CERTIFICATION OF THE SETTLEMENT CLASS FOR SETTLEMENT PURPOSES**

PLEASE TAKE NOTICE that The State of Michigan Retirement Systems (“Lead Plaintiff”), through counsel, hereby moves this Court before the Honorable Robert W. Sweet, for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure: preliminarily approving the proposed partial settlement; approving the proposed forms of the notice of pendency of class action and proposed partial settlement and the summary notice of pendency of class Action and proposed partial settlement; approving the proposed methods of disseminating notice; certifying the Settlement Class for settlement purposes only; appointing Lead Plaintiff as Class Representative and Berman DeValerio and Labaton Sucharow LLP as Class Counsel; setting a date for the Settlement Hearing; and such other and further relief as the Court deems just and proper. The Bear Stearns Defendants will not oppose the motion.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiff submits herewith (1) Lead Plaintiff’s Memorandum of Law in Support of its Unopposed Motion for Preliminary Approval of Partial Settlement, Approval of Notice to the Settlement Class and Certification of the Settlement Class for Settlement Purposes, (2) the Declaration of James W.

Johnson, attaching the Stipulation and Agreement of Settlement with the Bear Stearns Defendants, and (3) a proposed order.

Dated: June 6, 2012

Respectfully submitted,

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*Co-Lead Counsel for Lead Plaintiff and  
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